

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO:  CASES IDENTIFIED IN EXHIBIT A</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

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**PLAINTIFFS' MOTION TO LIMIT THE OPINIONS AND TESTIMONY OF DR.  
PETER L. ROSENBLATT**

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Plaintiffs submit this *Motion to Limit the Opinions and Testimony of Dr. Peter L. Rosenblatt*. Pursuant to Federal Rules of Evidence 702 and 403 and for the reasons outlined in *Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion to Limit the Opinions and Testimony of Dr. Peter L. Rosenblatt* ("Plaintiffs' Memo"), which is being filed contemporaneously with this Motion, Plaintiffs respectfully request that the Court limit Dr. Rosenblatt's testimony. Plaintiffs also rely on the following exhibits:

- B Defendants' Retained Expert Disclosures
- C General Expert Report of Dr. Rosenblatt
- D General Deposition Transcript of Dr. Rosenblatt

Plaintiffs respectfully request that the Court exclude Dr. Rosenblatt's opinions set out in Plaintiffs' Memo because they do not meet the standards set out under Rule 702 or in *Daubert*. These opinions are further unfairly prejudicial to Plaintiffs under Rule 403 and also have the potential to mislead the jury or confuse the issues in these cases.

Respectfully submitted,

**MOSTYN LAW**

/s/ Mark Sparks

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**ATTORNEY FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been forwarded to all counsel of record on this 21<sup>st</sup> day of July, 2016, in accordance with the Federal Rules of Civil Procedure.

/s/ Mark Sparks

Mark Sparks